

COASTAL CONSERVANCY

Staff Recommendation

April 24, 2008

NORTH SLOPE SONOMA MOUNTAIN RIDGE TRAIL

File No. 07-044

Project Manager: Maxene Spellman

RECOMMENDED ACTION: Authorization to disburse up to \$575,000 to the Sonoma County Agricultural Preservation and Open Space District to construct 4.25 miles of the Bay Area Ridge Trail and a half mile spur trail overlook, along the ridge on the north slope of Sonoma Mountain stretching west out of Jack London State Historic Park in southwestern Sonoma County.

LOCATION: Sonoma Mountain, southern Sonoma County

PROGRAM CATEGORY: San Francisco Bay Area Conservancy

EXHIBITS

Exhibit 1: [Project Location and Trail Alignment](#)

Exhibit 2: [Site Photographs](#)

Exhibit 3: [Letters of Support](#)

Exhibit 4: [Mitigated Negative Declaration, Comments and Responses for Mitigated Negative Declaration: North Slope Sonoma Mountain Ridge Trail Project, Mitigation Monitoring and Reporting Program, and Board Resolution](#)

RESOLUTION AND FINDINGS:

Staff recommends that the State Coastal Conservancy adopt the following resolution pursuant to Chapter 4.5 of Division 21 of the Public Resources Code:

“The State Coastal Conservancy hereby authorizes disbursement of up to five hundred seventy-five thousand dollars (\$575,000) to the Sonoma County Agricultural Preservation and Open Space District (“the District”) to construct 4.25 miles of the Bay Area Ridge Trail and one half mile of a spur trail overlook, on the north slope of Sonoma Mountain in Sonoma County subject to the following conditions:

1. Prior to the disbursement of funds the District shall submit for the review and approval of the Executive Officer of the Conservancy:
 - a. A work program, including project schedule and budget, and the names of any contractors and/or subcontractors to be employed on the project;
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- b. Evidence that all permits and approvals necessary to implement the project have been obtained; and
 - c. A signing plan for the project.
2. The District shall enter into an agreement with the Sonoma County Regional Parks Department for the operation and maintenance of the project after completion of the construction of the project.
3. The District shall provide evidence to the Conservancy that it has implemented the Mitigation Monitoring and Reporting Program, attached to the accompanying staff recommendation as Exhibit 4.”

Staff further recommends that the Conservancy adopt the following findings:

“Based on the accompanying staff report and attached exhibits, the State Coastal Conservancy hereby finds that:

1. The proposed project is consistent with the purposes and objectives of the San Francisco Bay Area Conservancy Program, Chapter 4.5 of Division 21 of the Public Resources Code.
2. The proposed project is consistent with the Project Selection Criteria and Guidelines last updated by the Conservancy on September 20, 2007.
3. The Conservancy has independently reviewed and considered the Mitigated Negative Declaration adopted by the District on March 18, 2008 pursuant to the California Environmental Quality Act (CEQA), the Mitigation Monitoring and Reporting Program, and the public comments for the North Slope Sonoma Mountain Ridge Trail Project (attached to the accompanying staff recommendation as Exhibit 4). The Conservancy finds that the project, as mitigated, avoids, reduces or mitigates the possible significant environmental effects and that there is no substantial evidence that the project will have a significant effect on the environment, as defined in 14 California Code of Regulations Section 15382.”

PROJECT SUMMARY:

Conservancy staff recommends authorization of a grant of \$575,000 to the Sonoma County Agricultural Preservation and Open Space District (“the District”) to construct the North Slope Sonoma Mountain Ridge Trail project. The District proposes to construct 4.25 miles of a new Bay Area Ridge Trail segment including improvements to an access road, development of a parking area and trailhead, and construction of three bridges. The project will also include creation of one half mile spur trail leading from the proposed Ridge Trail to an overlook into Bennett Valley. The trail alignments are shown as Phase I, Phase II, and Phase III (excluding the segment within Jack London State Historic Park) on Exhibit 1, North Slope Sonoma Mountain Ridge Trail Map. The proposed project will greatly expand public use of Sonoma Mountain and extend the Bay Area Ridge Trail. Furthermore, the trails will give hikers, cyclists, and equestrians the chance to explore new open space areas in Sonoma County that contain unique and healthy habitat types such as bunch grass meadows, oak woodlands, bay forests, and redwood groves. The proposed one half mile spur trail will lead up to the Bennett Valley

overlook where trail users will be able to reach the north shoulders of Sonoma Mountain for spectacular views across the Valley and northern Sonoma County to the Mayacama Mountains.

The proposed project will also provide access for people with disabilities to portions of the Ridge Trail. While most of the trail will traverse steep terrain making it infeasible for handicapped users, the first 800 feet beyond the trailhead will be handicapped accessible. This section of trail will lead to a proposed creekside picnic site in a redwood grove. The District will also provide vehicular access to a handicapped parking area and overlook offering views of Sonoma Valley from a knoll above the staging area.

This new segment of the Ridge Trail will traverse four District-owned properties and one county-owned property to the western boundary of Jack London State Historic Park (“JLSHP”). The proposed parking at the trailhead on Jacobs Ranch will accommodate approximately 10-15 vehicles and up to 6 horse trailers. From the trailhead, a route will begin at approximately 1,000 feet elevation and climb through the Cooper’s Grove property to reach the upper elevations of 2,200 feet near the shoulders of Sonoma Mountain. The District will construct stacked switchbacks appropriate for all user groups to climb along the western portion of Cooper’s Grove and for a short climb up along the spur trail to the Bennett Valley overlook. Switchbacks on exceedingly steep terrain will also involve construction of retaining walls to support the turns. The District will install log barriers and split rail fences to keep users on the trail and reduce erosion of the soils. Finally, the District will construct three bridges and approximately twelve wet creek crossings. The bridges will be set on concrete abutments, with heights sufficient to allow the 100-year flood event in the stream channel. The wet crossings will be constructed of native rock, and will include inlets and energy dissipaters, to line the stream channel but not impede flow.

With its extensive experience in this region, and its long-standing relationship with the Conservancy, the District is well suited to carry out this project. The Sonoma County Regional Parks Department (“Regional Parks”) has agreed to perform long-term operations and maintenance once the trail is completed by the District. The District will also pursue funding with California Department of Parks and Recreation (“State Parks”) to support the future construction of a trail within JLSHP linking the proposed Ridge Trail to the existing “Hayfields” Park trail.

Site Description:

Sonoma Mountain is a defining geographic feature of Sonoma County, and serves as a backdrop for Bennett Valley and Sonoma Valley on the north and east side and the Highway 101 scenic corridor and Petaluma Valley on the south and west. The project area is located approximately five miles to the southeast of the city limits of Santa Rosa. The trail alignment will follow the ridgeline on the north slope of Sonoma Mountain. In addition to the valley and Mayacama Mountain views from the proposed Bennett Valley Overlook, the Ridge Trail will offer views of the Santa Rosa plain, the Coast Ranges, Mount St. Helena, Bennett Peak, Taylor Mountain and into Napa County.

Along the ridgeline within the project area are large swaths of open grasslands and savannah, offering sweeping views of the surrounding area. At lower elevations are areas more densely forested with tree species such as coast live oak, valley oak, black oak, Oregon white oak,

California buckeye and California bay. In the moist areas on the north facing slopes, Douglas fir, madrone, flowering currant and twinberry are present. The project area contains some of the few remaining redwood groves on Sonoma Mountain. The proposed trail will also traverse fourteen to sixteen creek crossings. The proposed bridge on Jacobs Ranch will cross the South Fork of the Matanzas Creek serving as gateway to the trail. Finally, wildlife species known to be present on these properties include mountain lions, bobcats, coyotes, golden eagles, quails, turkeys, deer, and anis swallowtail butterflies.

Project History:

The vision for the Bay Area Ridge Trail is a 500-mile multi-use, continuous trail that rings San Francisco Bay, high on the ridgeline. Under the leadership of the Conservancy and the Bay Area Ridge Trail Council (“BARTC”), and supported by a diverse group of project partners, the Ridge Trail creates an interconnected system of open space and trails that provides recreational opportunities and scenic views to the public. Begun almost 20 years ago, over 300 miles of trail are now dedicated and/or open to the public in all nine Bay Area counties. This authorization will further the Conservancy's statutory and strategic goals of improving access around San Francisco Bay. It is consistent with previous Conservancy authorizations to negotiate and acquire trail easements, prepare trail construction plans and designs, and construct and open trail segments to the public.

The proposed project will add 4.25 miles to completing the Bay Area Ridge Trail and is part of an ongoing effort by the District to provide trail connectivity on Sonoma Mountain. In order to connect existing trails across protected lands and expand the Ridge Trail in Sonoma County, the District acquired properties northwest of and adjacent to JLSHP. Over the past three years, the District has collaborated with the BARTC, which is funded by the Conservancy, to plan implementation of this and other Ridge Trail segments.

From 2003 through 2005, the District acquired the following properties on which the construction of the Ridge Trail segment is proposed:

In 2003, the District purchased fee title to the 168-acre Jacobs Ranch, which will serve as the western extent of the detailed portion of the trail project. The District is currently working on improvements to an access road leading from Sonoma Mountain Road to the Jacobs Ranch, which will be used as one of the primary access points to the 4.25 mile Ridge Trail segment. A component of the proposed project is to develop a portion of the Jacobs Ranch to serve as a staging and trailhead area.

In early 2004, in collaboration with the Bay Area Ridge Trail Council, the District acquired in fee title a 47-acre parcel of the Skiles Ranch, using grant funds from the Conservancy for the purposes of protecting the Ridge Trail corridor. The parcel is located adjacent to JLSHP and will provide a trail connection between the state park and the Wilroth property to the west.

In the fall of 2004, the District purchased a conservation easement over the 240-acre Wilroth property on the northwestern facing slopes of Sonoma Mountain, which is immediately adjacent to, and managed as part of, Sonoma State University’s Fairfield-Osborn Preserve. The District also accepted an 11-acre donation from the landowners that provides a key link in the trail corridor between the District-owned portion of the Skiles Ranch property and the Sonoma Mountain Woodlands held by Sonoma County Regional Parks.

In January 2005, the District acquired fee title to the 226-acre Cooper's Grove property, which bridges the gap between Jacobs Ranch and the Sonoma Mountain Woodlands. This acquisition filled the last gap to allow for planning and construction of the continuous 4.25 mile extension from the Ridge Trail segment in JLSHP westward to Jacobs Ranch. In 2000, the Conservancy partially funded construction of a 4.5 mile Ridge Trail segment in the JLSHP. The proposed 4.25 mile extension will connect to the existing 4.5 mile JLSHP Ridge Trail segment.

On May 18, 2005 the Conservancy approved a grant to the District for trail planning and environmental documentation for the development of the proposed new 4.25-mile Ridge Trail segment. The proposed construction project would implement the trail plan and Mitigated Negative Declaration completed by the District. This will ultimately double the length of the existing Sonoma Mountain Ridge Trail at JLSHP to create the opportunity for a 9-mile hike meandering through a variety of wild landscapes that offers spectacular views from the mountain's ridgeline. The District will continue to coordinate with State Parks to fill in the last gap of trail in JLSHP.

During the planning stage the District worked closely with the State Parks, Regional Parks and BARTC staff to find the most optimal route, and will continue to rely on this collaborative team to oversee the construction of the trail. Regional Parks has agreed to assume the responsibility for the trail's long-term operations and maintenance.

PROJECT FINANCING:

Coastal Conservancy	\$575,000
Sonoma County Agricultural Preservation and Open Space District	300,000
State Department of Parks and Recreation, Recreational Trails Grant, Volunteer, In kind Services	238,853
Total Project Cost	\$1,113,853

The expected source of Conservancy funds for this project is the FY 05/06 appropriation to the Conservancy from the California Clean Water, Clean Air, Safe Neighborhoods and Coastal Protection Act of 2002 (Prop. 40) for the San Francisco Bay Area Conservancy Program and FY 07/08 appropriation to the Conservancy from the California Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Bond Act of 2006 (Prop. 84). These funds may be used for the development of land resources in accordance with the provisions of the Conservancy's enabling legislation, Division 21 of the Public Resources Code. The proposed project serves to assist in the development of land-based public access and, as discussed in the section found immediately below, the project is consistent with Chapter 4.5 of Division 21. Propositions 40 and 84 also require the Conservancy to give priority to grant projects with matching funds (Public Resources Code Sections 5096.651 and 75071). The project is supported by a commitment by Sonoma County Agricultural Preservation and Open Space District and others to provide 48% of the cost of trail development.

CONSISTENCY WITH CONSERVANCY'S ENABLING LEGISLATION:

This project would be undertaken pursuant to Chapter 4.5 of the Conservancy's enabling legislation, Public Resources Code Sections 31160-31164, to address recreational goals of the San Francisco Bay Area Conservancy Program.

Pursuant to Section 31162, the Conservancy may award grants in the nine-county San Francisco Bay Area that help to achieve various specific goals, including the goal of increasing public access. This project is located entirely within Sonoma County, one of the designated nine counties of the San Francisco Bay Area. Consistent with Section 31162(a), the project would improve public access around the ridgetops by contributing towards the completion of a regional ridge trail system, and is consistent with the District's adopted "Connecting Communities and Lands, A Long Range Acquisition Plan". As required by Section 31162(a), the project will not have a significant adverse impact on environmentally sensitive areas and wildlife.

Section 31163(a) directs the Conservancy to cooperate with nonprofit land trusts and other organizations in identifying and adopting long-term resource and outdoor recreational goals for the San Francisco Bay Area. Completion of the Ridge Trail is one of the goals identified in the Bay Area Open Space Council's "Regional Needs Briefing Book."

The proposed project satisfies the criteria for determining project priorities under Section 31163(c) in the following respects: (1) the Ridge Trail is a multi-jurisdictional resource; (2) the Ridge Trail serves a regional constituency; (3) the project can be implemented in a timely way; (4) the project provides an opportunity for benefits that could be lost if the Sonoma County Agricultural Preservation and Open Space District is unable to construct the trail improvements; and (5) the project includes significant matching contributions from the District.

**CONSISTENCY WITH CONSERVANCY'S
STRATEGIC PLAN GOAL(S) & OBJECTIVE(S):**

The proposed project is consistent with **Goal 11** of the Conservancy's Strategic Plan, which is to improve public access, recreation and educational facilities in and around the San Francisco Bay, coast, ridge tops, urban open spaces and natural areas.

Consistent with **Goal 11, Objective A**, the proposed project involves the construction of a new public trail across land that was previously not available to the public in the Bay Area. The trail will be built upon land recently acquired by Sonoma County Agricultural Preservation and Open Space District.

Consistent with **Goal 11 Objective B**, the proposed project will add approximately 4.25 miles of new trail to help complete the Bay Area Ridge Trail and will provide regionally significant public access.

Consistent with **Goal 11 Objective L**, the proposed project will include 800 feet of new ADA-compliant trail and provide vehicular access to a handicapped parking area and overlook.

**CONSISTENCY WITH CONSERVANCY'S
PROJECT SELECTION CRITERIA & GUIDELINES:**

The proposed project is consistent with the Conservancy's Project Selection Criteria and Guidelines last updated September 20, 2007, in the following respects:

Required Criteria

1. **Promotion of the Conservancy's statutory programs and purposes:** See the "Consistency with Conservancy's Enabling Legislation" section above.
2. **Consistency with purposes of the funding source:** See the "Project Financing" section above.
3. **Support of the public:** The project is supported by State Senator Patricia Wiggins, Assemblywoman Noreen Evans, Sonoma County Regional Parks Department, Sonoma County Trails Council, LandPaths, and the Bay Area Ridge Trail Council.
4. **Location:** The project is located in Sonoma County along the ridgeline of Sonoma Mountain, which is entirely within the jurisdiction of the San Francisco Bay Program Conservancy.
5. **Need:** The project is a necessary component of developing the Ridge Trail in Sonoma County. The Bay Area Ridge Trail Council, the District, and the State Parks are developing plans to link this trail beginning in Jack London State Historic Park to other Ridge Trail segments in Annadel State Park. This project will provide the needed incentive to continue this effort.
6. **Greater-than-local interest:** The Ridge Trail is a major regional attraction. When completed, it will offer spectacular views of the entire Bay Area, and will link with many other parklands and preserves. Completion of the Ridge Trail is one of the goals identified in the Bay Area Open Space Council's "Regional Needs Briefing Book." Sonoma Mountain is the most impressive geographic feature of Sonoma County, and the trail along its north slope linking it to Jack London State Historic Park will greatly enhance the semi-wilderness experience and spectacular views that visitors from all over the Bay Area can enjoy.

Additional Criteria

7. **Urgency:** The District has acquired four properties, has obtained a management commitment from Regional Parks, and has identified matching funds for this project. The project will provide the incentive to move ahead with additional segments of the Ridge Trail. If not implemented at this time, these opportunities could be lost.
8. **Leverage:** See the "Project Financing" section above.
9. **Readiness:** The District has finalized plans and environmental review for the project, dedicated necessary staff for implementation, identified matching funds, and is ready to move forward.
10. **Realization of prior Conservancy goals:** See "Project History" above.
11. **Cooperation:** This project is a collaborative effort involving the District, Regional Parks, State Parks, BARTC, the Sonoma County Trails Council, Volunteers for Outdoor California, and Sonoma State University.

COMPLIANCE WITH CEQA:

Pursuant to the California Environmental Quality Act (CEQA), the District, as lead agency, prepared the Initial Study and Mitigated Negative Declaration, which were noticed and circulated for public review on October 15, 2007. The comment period ended on November 15, 2007. The District's Board of Directors approved the project and adopted the Mitigated Negative Declaration (MND) including a Mitigation Monitoring and Reporting Program (MMRP) (Exhibit 4: Mitigated Negative Declaration, Comments and Responses for Mitigated Negative Declaration: North Slope Sonoma Mountain Ridge Trail Project, Mitigation Monitoring and Reporting Program, and Board Resolution) on March 18, 2008. On March 20, 2008, the District filed a Notice of Determination with the County Clerk of Sonoma County.

CEQA requires consideration of potential environmental effects of agency actions and approvals, unless exempt. With respect to the work that the Conservancy would fund, the Initial Study and MND identified potentially significant impacts in the areas of aesthetics, air quality, biological resources, hazards and hazardous materials, cultural resources, hydrology and water quality, geology/soils, noise, public services, and recreation. Mitigation measures have been adopted to assure that these potential impacts were eliminated or reduced to *less than significant levels*, as summarized below:

1. **Aesthetics:** Trail and bridge construction may require the removal of trees protected by the Sonoma County Tree Protection Ordinance. The District shall implement mitigation measures for protection of existing trees and replacement of any protected trees that are removed. (See Biological Resources regarding tree protection and replacement.)
2. **Air Quality:** Air quality impacts from the proposed trail and access facilities will result from project construction and operation. Impacts from increased project-related traffic are considered *less than significant* because the proposed project would generate an estimated maximum of 81 trips per day, well below the Bay Area Air Quality Management District standard for producing air quality problems due to vehicular emissions. However, construction-related emissions may have a short-term effect on air quality.

Mitigation measures to address air quality impacts, include: dust control by contractors during construction, watering during excavation and active construction, grading and site preparation, covering trucks hauling debris, use of dust-proof chutes to load debris, and maintenance and operation of construction equipment so as to minimize exhaust emissions.

3. **Biological Resources:** The proposed project calls for the removal of 31 trees protected by the Sonoma County Tree Protection Ordinance. Although there are no special-status plants or animals currently occurring within the trail alignment corridor, the removal of trees could cause disturbance to potential nesting habitat and the spread of Sudden Oak Death (SOD).

To mitigate these impacts to *less than significant levels*, the MND requires compensatory tree replacement of two trees replaced for each tree removed with an

established site for reforestation, a schedule for planting, with species resistant to Sudden Oak Death, a 3 year irrigation scheme, and a commitment to monitor trees for 5 years. Trees not subject to removal will also be protected during construction to ensure that no activities cause damage to the root systems near the trail.

To reduce impacts to nesting birds, prior to construction a qualified biologist will conduct a pre-construction survey to determine if nesting is occurring in trees along the trail alignment (14 to 30 days prior to construction depending on the timing during the breeding season). If nests or nesting behavior are observed, the proposed trail alignment shall be located at least 100 feet from the nest. To protect the nest site, buffers using flagging or staking around the tree in accordance with California Department of Fish and Game recommendations will be implemented until the young have fledged.

To mitigate against the spread of SOD, the MMP includes measures to limit pathogen spread during trail construction and subsequent trail use. The MND includes measures to properly remove and dispose of infected materials, including, avoiding removal of diseased trees when moist conditions favor pathogen spread (November to May) and when possible leaving tree debris on site in a safe area. To limit exposure and spread by trail users, the MND proposes identification of infected trees within the trail corridor, restriction of recreation activities in the winter, and informational signage instructing trail users regarding measures to limit spread of SOD to offsite areas.

4. **Cultural Resources:** Although no prehistoric archaeological sites would be directly affected by the proposed trail alignment, the general vicinity of the trail system contains two prehistoric sites which may be affected indirectly by increased human activity in the area.

Several mitigation measures will be implemented to reduce potential impacts to *less than significant levels*, including: a chert flake scatter in the southern portion of the project site shall be recorded to current standards by a qualified professional archaeologist; monitoring of earth-disturbing activities by a qualified archaeologist with authority to halt ground-disturbing work and excavations if potentially significant archaeological materials or human remains are encountered to allow for recordation, recovery, retrieval, and/or removal during the construction process; if the remains are determined to be Native American, the Native American Heritage Commission will be contacted and recommendations by the tribe shall be carried out. If paleontological resources are encountered during construction activities, all ground disturbance shall be halted and a qualified paleontologist will be retained to identify and evaluate the resource, and recommend documentation and measures to prevent significant adverse effects on the resource.

5. **Geology and Soils:** Erosion and loss of topsoil could occur at the site during construction of the trail, parking area, and access facilities.

Several design and maintenance features will be implemented to address these impacts, including: allowing the trail to cure by prohibiting high impact uses (such as mountain bikes and horses) during the first rainy season after construction; incorporating rolling water dips and reverse grades at appropriate locations to remove surface water from the trail; setting bridges on concrete abutments, with heights sufficient to allow the 100-year flood event in the stream channel; installing crossings of native rock, including rock-lined

inlets and energy dissipaters; and maintenance and repair of any failed trail infrastructure after the first winter season. Mitigation to be implemented in the new parking area, includes: re-grading closer to the original natural contours, surfacing with compacted base rock, and closing and restoring the existing corral access road between the ranch house and the barn to grassland, and rerouting access by a new pathway routed through the parking area, which would have less unvegetated area than the existing access road.

As described below in the Hydrology and Water Quality section, the District shall also prepare and implement a Storm Water Prevention Plan (SWPP) incorporating best management practices (BMPs) during construction activities, which in combination with the above-described design and maintenance measures would reduce this impact to a *less than significant* level.

6. **Hazards and Hazardous Materials:** Construction activities would require the use of certain hazardous materials such as fuels, oils, solvents, and glues. Inadvertent release of large quantities of these materials into the environment could adversely impact soil, surface waters, or groundwater quality.

Mitigation measures will be implemented to reduce this impact to a *less than significant level*, including: preparation and implementation of a SWPP, including provisions for control of potentially hazardous construction materials (as described below in the Hydrology and Water Quality section); and preparation and implementation of an operational Fire Safety Plan, including fire prevention and response training and procedures.

7. **Hydrology and Water Quality:** Construction activities may increase erosion potential and contribute to the degradation of water quality by increasing sedimentation and turbidity in the South Fork of Matanzas Creek and downstream surface waters.

These impacts will be reduced to *less than significant levels*, by preparation and implementation of a SWPP incorporating BMPs during construction activities as required by the State Water Resources Control Board and the Regional Water Quality Control Board. The plan shall include measures such as soils stabilization, revegetation, and runoff control to limit increases in sediment in storm water runoff, such as detention basins, straw bales, silt fences, check dams, geofabrics, drainage swales, and sandbag dikes. It shall also include a list of provisions to eliminate or reduce discharge of materials to storm water, description of waste management practices and maintenance and training practices.

8. **Noise:** Construction could create a substantial temporary or periodic increase in ambient noise levels in the project vicinity for a few nearby residences.

These impacts will be addressed by limiting construction activities to Monday through Friday 7AM to 6PM and Saturdays 9AM to 5PM, and prohibiting work on Sundays and national holidays. Other mitigation measures include: muffled exhaust, limiting staging of loud equipment, shutting off idling equipment, and notifying adjacent residents in advance of construction work.

9. **Public Services:** Construction and use of the proposed trail and access facilities would involve activities that could increase the risk of fire at the site. As discussed above, the proposed construction Fire Safety Plan proposes operational procedures, and

implementation of the mitigation measure related to fire hazard to reduce the risk of fire to a *less than significant* level, and no new or physically altered fire protection facilities would be required to continue to provide acceptable fire protection service to the proposed project.

10. **Recreation:** The construction of a recreational trail and access facilities might have an adverse physical effect on the environment. Mitigation measures to reduce impacts to a *less than significant* level are described above.

In general, the District's Natural Resources Planner will sign off on the implementation of the mitigation measures included in the MMRP. Periodically, staff of other County departments or regulatory agencies will be involved in the implementation of specific mitigation measures, as identified in the MMRP (see Exhibit 4).

In response to the proposed MND, the District also received six comment letters from organizations, and thirty verbal and/or e-mail comments from individuals. Most letters from organizations indicated support for the project, or provided additional information or suggestions not related to environmental impacts. In response to public comments concerning potential impacts to Native American cultural resources from the Federated Indians of Graton Rancheria ("FIGR"), the District revised Cultural Resources Mitigation Measures V-2 and V-4 to provide consultation with a Native American monitor in the pre-construction meeting (V-2), and monitoring of earth-disturbing activities in the vicinity of an identified archaeological site (V-4).

The District also responded to public comments in opposition to the prohibition of dogs on the proposed trail maintaining that the policy is intended to protect the sensitive wildlife along the trail route, and is consistent with the dog restrictions within Jack London State Historic Park and the Sonoma State University's Fairfield Osborn Preserve.

Staff has independently reviewed the MND and the public comments received and recommends that the Conservancy find that there is no substantial evidence that the portion of the project funded by the Conservancy, as mitigated, will result in a significant adverse effect on the environment as defined in 14 Cal. Code of Regulations Section 15382. Staff will file a Notice of Determination upon approval of the project.